



STATE OF TENNESSEE
DEPARTMENT OF ENVIRONMENT AND CONSERVATION
NASHVILLE, TENNESSEE 37243-0435

ROBERT J. MARTINEAU, JR.
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March 21, 2016

Via Electronic Mail to Comments-southern-chokeee-watauga @fs.fed.us

Keith Kelley

Watauga District Ranger
Cherokee National Forest
Watauga Ranger District
4400 Unicoi Drive
Unicoi, TN 37692

Dear Keith Kelley:

The Tennessee Department of Environment and Conservation (TDEC) appreciates the opportunity to provide comments on the United States Forest Service *Draft Environmental Assessment for Offset Project on the Watauga Ranger District* (Draft EA) in Sullivan County, Tennessee. The applicant, U.S. Forest Service, proposes to create early-successional forest (ESF) for wildlife; encourage oak and other mast-producing species; thin areas to promote forest health; maintain existing roads, reconstruct an existing road, and construct temporary roads; prescribe burn; improve wildlife habitat conditions through the placement of nest boxes and bat roost boxes, the construction of waterholes, and providing drumming logs; decommission roads; and authorize roads in order to work toward the desired conditions for the project area, as directed in the Cherokee National Forest (CNF) Revised Land and Resource Management Plan (RLRMP, USDA Forest Service 2004a). These activities would occur on approximately 24,139 acres of National Forest System lands.

Actions considered in detail within the Draft EA include:

- Alternative A – No Action Alternative – The Forest Service would not implement any projects in the project area at this time. Current uses of the area would continue until such uses were prohibited by changed environmental conditions.
- Alternative B – Proposed Action Alternative – The Forest Service would create approximately 574 acres (35 stands) of ESF for wildlife habitat needs in the Offset project area; use mechanical treatment methods (e.g. chainsaw) on approximately 973 acres (81 stands) to select and provide for the release of mast-producing trees; reduce the stocking density of the understory and midstory on 155 acres (7 stands) using herbicides; thin approximately 366 acres (12 stands), treat approximately 118 acres (six stands) via thinning with group selection; improve and maintain approximately 19.7 miles of existing road in support of timber sale activities; conduct low-intensity prescribed burns on approximately 2,917 acres in seven burn blocks; place 45 roost/nest boxes, construct 15 waterholes, and distribute 75 drumming logs to improve habitat conditions for wildlife and wildlife viewing; decommission approximately 0.58 miles of authorized (system) roads and 1.40 miles of unauthorized roads; and authorize approximately 0.97 miles of unauthorized roads.
- Alternative C – Modified Proposed Action Alternative – The Forest Service would create a total of 663 acres of ESF for wildlife needs in the Offset project area; use mechanical treatment methods (e.g. chainsaw) on approximately 973 acres (81 stands) to select and provide for the release of mast-producing trees; reduce the stocking density of the understory and midstory on 155 acres (7 stands) using herbicides; thin approximately 328 acres (11 stands); treat approximately 118 acres (6 stands) via thinning with group

selection; improve and maintain approximately 19.7 miles of existing road in support of timber sale activities; conduct low-intensity prescribed burns on approximately 2,917 acres in seven burn blocks; place 45 roost/nest boxes, construct 15 waterholes, and distribute 65 drumming logs to improve habitat conditions for wildlife and wildlife viewing; decommission approximately 0.58 miles of authorized (system) roads and 1.40 miles of unauthorized roads; and authorize approximately 0.97 miles of unauthorized roads.

- Alternative D – Modified Proposed Action Alternative – The Forest Service would create a total of 602 acres of ESF for wildlife needs in the Offset project area; use mechanical treatment methods (e.g. chainsaw) on approximately 973 acres (81 stands) to select and provide for the release of mast-producing trees; reduce the stocking density of the understory and midstory on 155 acres (7 stands) using herbicides; thin approximately 328 acres (11 stands); treat approximately 118 acres (6 stands) via thinning with group selection; improve and maintain approximately 18.8 miles of existing road in support of timber sale activities; conduct low-intensity prescribed burns on approximately 2,917 acres in seven burn blocks; place 45 roost/nest boxes, construct 15 waterholes, and distribute 65 drumming logs to improve habitat conditions for wildlife and wildlife viewing; decommission approximately 0.58 miles of authorized (system) roads and 1.40 miles of unauthorized roads; and authorize approximately 0.97 miles of unauthorized roads.

TDEC's **Tennessee State Parks and Real Property Management** has reviewed the Draft EA and has no specific comments regarding the proposed action or its alternatives.

TDEC's **Division of Air Pollution Control (APC)** has reviewed the Draft EA and has the following comments on the proposed action and its alternatives:

- APC encourages and supports actions that help to minimize outbreaks of wildland fire and forest fires.
- APC recommends that the U.S. Forest Service include in the Final EA that best management practices, such as following a smoke management plan, having trained staff conduct and manage any burns, and alerting local, county and state forestry offices when planned burns are to be conducted, will be employed when considering use of prescribed burning in forestry management actions. APC also recommends that burning be conducted in a manner to minimize any impacts to local residents or forest visitors and to minimize any impacts to regional air monitoring network monitoring sites.
- APC recognizes that road construction is included in the proposed action and its alternatives and recommends that fugitive dust emissions be addressed in the context of the proposed action and its alternatives in the Final EA.
- APC recommends that the Environmental Protection Agency (EPA) National Ambient Air Quality Standards (NAAQS) criteria pollutants be referenced within the Final EA and serve as a guide for comparison to any projected air quality impacts where prescribed burning is proposed.¹

TDEC's **Division of Natural Areas (DNA)** has reviewed the Draft EA and based on the information within the rare species database and the project location, does not anticipate adverse impacts to rare, threatened, and endangered plant species. DNA encourages the use of management prescriptions to restore and preserve forest habitat.

TDEC'S **Division of Water Resources (DWR)** has reviewed the Draft EA and notes that impacts could occur to waters of the state through the application of herbicides near streams, the application of aquatic herbicides in streams, and/or work performed near streams. Any activities which could impact a stream, river, lake or wetland of this nature will require further review by the TDEC. DWR recommends that the U.S. Forest Service contact the local TDEC Environmental Field Office² for a review of any work to be done near aquatic resources.

¹ The current EPA NAAQS website is <http://www3.epa.gov/ttn/naaqs/criteria.html>.

² The locations and contact information for TDEC field offices can be accessed at <http://tn.gov/environment/topic/about-field-offices>.

TDEC appreciates the opportunity to comment on this Draft EA. Please note that these comments are not indicative of approval or disapproval of the proposed action or its alternatives, nor should they be interpreted as an indication regarding future permitting decisions by TDEC. Please contact me should you have any questions regarding these comments.

Sincerely,

A handwritten signature in blue ink that reads "Kendra Abkowitz". The script is cursive and fluid.

Dr. Kendra Abkowitz
Director of Policy and Planning
Phone: (615)-532-8689

cc:

Bill Avant, TDEC, TSP
Lacey Hardin, TDEC, APC
Stephanie A. Williams, TDEC, DNA
James Sutherland, TDEC, DWR